

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**
Case No. 1:17-CV-184 (CCE) (LPA)

BARRY HONIG, an individual,

Plaintiff,

v.

ROBERT LADD, an individual; MGT
CAPITAL INVESTMENTS, INC., a
Delaware corporation; TERI BUHL,
an individual; and DOES 1-20,

Defendants.

**REPLY DECLARATION OF TERI
BUHL IN RESPONSE TO
OPPOSITION BRIEF OF BARRY
HONIG AND IN FURTHER
SUPPORT OF RULE 12(b)(2)
MOTION TO DISMISS THE
COMPLAINT**

I, Teri Buhl, pursuant to 28 U.S.C. § 1746, declare the following to be true and correct to the best of my knowledge and, if asked to do so, I could and would competently testify as to these facts:

1. I am named as a defendant in the above-captioned action. I make this declaration in reply to Barry Honig's Brief in Opposition to Defendant Teri Buhl's Motion to Dismiss filed on July 27, 2017 and in further support of my Motion to Dismiss the Complaint for lack of personal jurisdiction pursuant to Federal Rule of Civil Procedure 12(b)(2).

2. In connection with the drafting, research, or investigating of the articles attached as Exhibits A and C through F to the Complaint in the above-captioned action (which Plaintiff refers to as the "Defamatory Articles"), I never placed or received a telephone call to any person I knew to be located in North Carolina.

3. In connection with the drafting, research, or investigating of the articles attached as Exhibits A and C through F to the Complaint in the above-captioned action (which Plaintiff refers to as the "Defamatory Articles"), I never corresponded – by email, text, skype, instant message, direct message, facsimile, or another mode of communication – with any person I knew to be located in North Carolina.

4. I have never had any romantic or sexual relationship with Robert Ladd.

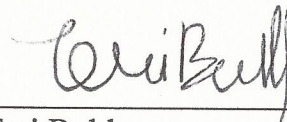
5. I do not, and have never, owned any stock in MGT Capital Investments, Inc. and I would not (and did not) derive any benefit from any movement in MGT's share price.

I declare under penalty of perjury that the foregoing statements are true and correct.

Dated: August 18, 2017

Executed at New York County

State of New York

A handwritten signature in black ink, appearing to read "Teri Buhl", written over a horizontal line.

Teri Buhl

CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send email notification of such filing to the following:

David E. Fox
Moore & Van Allen
P.O. Box 13706
Research Triangle Park, NC 27709
foxd@mvalaw.com

Charles J. Harder
Ryan J. Stonerock
Harder Mirell & Abrams LLP
132 S Rodeo Drive, Fourth Floor
Beverly Hills, CA 90212
charder@hmafirm.com
rstonerock@hmafirm.com

Attorneys for Plaintiff

Darren Laverne
Jeffrey W. Davis
John P. Coffey
Kramer Levin Naftalis & Frankel LLP
1177 Avenue of the Americas
New York, NY 10036
dlaverne@kramerlevin.com
jdavis@kramerlevin.com
scoffey@kramerlevin.com

Erik R. Zimmerman
Robinson, Bradshaw & Hinson, P.A.
1450 Raleigh Road, Ste. 100
Chapel Hill, NC 27517
ezimmerman@robinsonbradshw.com

Jonathan Christopher Krisko
Robinson, Bradshaw & Hinson, P.A.
101 N. Tryon St., Ste. 1900
Charlotte, NC 28246
jkrisko@rbh.com

Attorneys for Defendants MGT Capital Investments, Inc. and Robert Ladd

/s/ Erica A. Wolff
Erica A. Wolff